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UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

YORK WALLCOVERINGS, INC.
Plaintiff

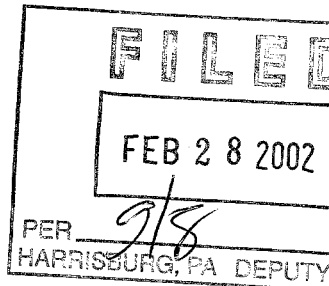
No.: 1:CV:01-0793

vs.

S.A. MAXWELL COMPANY, INC. AND
JAIMA BROWN

Defendants

(The Hon. Sylvia H. Rambo)



**APPLICATION FOR AN
ORDER TO SHOW CAUSE**

Plaintiff York Wallcoverings, Inc. ("York") hereby makes application to this Court for an Order to Show Cause why an order should not be made and entered herein, pursuant to Rule 65 of the Federal Rules of Civil Procedure, preliminarily enjoining Defendants S.A. Maxwell, Inc. ("Maxwell") and Jaima Brown ("Brown") from distributing or selling the wallcovering boarder and fabric design that appears in the Sesquicentennial sample book.

Defendants' design is substantially similar to and appropriated from York's wallcovering and border design known for purposes of this litigation as York's Elephant Wallcovering and York's Elephant Border for which certificate of registration No. VA 1-064-203 and VA-064-204 have been issued to York. York seeks preliminary injunctive relief because Defendants have infringed York's Elephant Wallcovering and York's Elephant Border and the continued distribution and sale of the infringing design threatens to cause irreparable harm to York.

In support of this application York relies on the Complaint and the accompanying Memorandum in Support of Application for An Order to Show Cause together with the annexed affidavit and exhibits attached thereto.

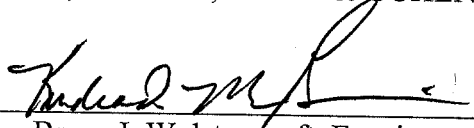
York requests that a hearing be established at the Court's earliest convenience at which York would seek to present the testimony of several witnesses. Enough discovery has been conducted in this matter to support this application, and, accordingly, York moves for an order scheduling a hearing.

York requests that the Court establish deadlines for the filing of York's motion for preliminary injunction and supporting brief, a response by Maxwell, and, if necessary, a reply by York. York proposes that it be directed to file its motion and supporting brief 10 days before the hearing with a response from Maxwell being due 3 days before hearing. York, if necessary, would file a reply the day before hearing.

A proposed form of Order is submitted herewith.

BARLEY, SNYDER, SENFT & COHEN, LLC

Date: 2/27/02

BY: 
Bruce J. Wolstoncroft, Esquire
Kendra D. McGuire, Esquire
Attorneys for Plaintiff
York Wallcoverings, Inc.

126 East King Street
Lancaster, PA 17602
(717) 299-5201
Court I.D. No. 43923
Court I.D. No. 50919

CERTIFICATE OF SERVICE

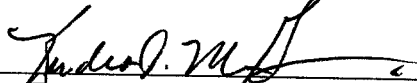
I HEREBY CERTIFY that a true and correct copy of the foregoing Application for an Order to Show Cause has been served this 27th day of February, 2002, by first-class mail, postage pre-paid, upon:

Albert Robin, Esquire
Robin, Blecker & Daley
330 Madison Avenue
2nd Floor
New York, NY 10017

Ronald P. Schiller, Esquire
Piper, Marbury, Rudnick & Wolfe, LLP
3400 Two Logan Square
18th & Arch Streets
Philadelphia, PA 19103-2762

Joseph L. Turchi, Esquire
Rawle & Henderson, LLP
The Widener Building
One South Penn Square
Philadelphia, PA 19107

BARLEY, SNYDER, SENFT & COHEN, LLC

By: 
Bruce J. Wolstoncroft, Esquire
Kendra D. McGuire, Esquire
Attorneys for Plaintiff
York Wallcoverings, Inc.

126 East King Street
Lancaster, PA 17602-2893
Court I.D. No. 43923
Court I.D. No. 50919